

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

BRITISH TELECOMMUNICATIONS
PLC and BT AMERICAS, INC.,

Plaintiffs,

v.

PALO ALTO NETWORKS, INC.,

Defendant.

C.A. No. 22-1538-CJB

JURY TRIAL DEMANDED

**DECLARATION OF RUST INCE-SCHROEDER IN SUPPORT OF
DEFENDANT PALO ALTO NETWORKS, INC.’S MOTION TO
TRANSFER VENUE TO THE NORTHERN DISTRICT OF CALIFORNIA**

I, Rust Ince-Schroeder, declare:

1. I hold the position of Director, Global People Operations at Palo Alto Networks, Inc. (“Palo Alto Networks” or “PAN”). I respectfully submit this declaration in support of Palo Alto Networks’ Motion to Transfer to the Northern District of California. I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. Palo Alto Networks is headquartered in Santa Clara, California, which is approximately 7.9 miles from the Northern District of California’s San Jose

courthouse. Palo Alto Networks is incorporated in Delaware, but has no offices or facilities in the State of Delaware.

3. Palo Alto Networks employs approximately 8,139 employees in the United States. Approximately 4,012 of those employees work in California, and approximately 3,241 of those employees are assigned to the headquarters in Santa Clara, California.

4. I have been informed of the Palo Alto Networks products or services that are at issue in this lawsuit, identified in the complaint as PAN's "Strata" network security platform (e.g., PA-Series, CN-Series, VM-Series, and Prisma Access); PAN's WildFire; PAN's Unit 42; PAN's Cortex XDR platform. I have also been informed that those Palo Alto Networks products or services have been defined as "Accused Products" in the lawsuit.

5. All but one of Palo Alto Networks' Accused Products were designed, developed, tested, and continue to be maintained at PAN headquarters. The engineering teams and personnel most knowledgeable about the design, development, and maintenance of all but one of the Accused Products work from PAN headquarters. The Cortex XDR platform was designed, developed, tested, and continues to be maintained by employees located in Israel. The engineering teams and personnel most knowledgeable about design, development, and maintenance of the Cortex XDR platform are located in Israel.

6. I have been informed that the documentation concerning the Accused Products, including any technical, financial, or marketing documents associated with the corresponding departments are located in Santa Clara, California or Israel. I have also been informed that the electronic data and source code regarding the Accused Products are accessible from at least Santa Clara, California and Israel.

7. Palo Alto Networks' departments and employees responsible for sales, marketing, and financial matters related to the Accused Products are predominately based in and located at Palo Alto Networks' headquarters in Santa Clara, California.

8. Most of Palo Alto Networks' expected party witnesses in this case work and reside within California while some reside and work in Israel. No expected party witnesses reside in Delaware.

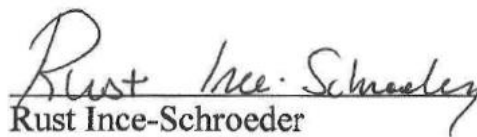
9. The following positions at Palo Alto Networks are responsible for the Accused Products, have direct knowledge about the design, development, sales, and/or marketing of the Accused Products, and are located at Palo Alto Networks' headquarters in Santa Clara, California:

- Senior Vice President of Cloud Delivered Security Services:
knowledge regarding the design, development, and testing of the
Accused Products;
- Senior Vice President, Worldwide Operations: knowledge regarding
manufacturing and supply chain for the Accused Products;

- Director of Software Engineering: knowledge of design, structure, and operation of the Accused Products;
- Director of FR&A (Finance): knowledge of revenue, costs, and profits associated with the Accused Products;
- Senior Director of Operations & Analytics (Marketing): knowledge of marketing of the Accused Products.
- Vice President, Product Management: knowledge of development and marketing of Accused Products.

10. Based on the information available to me, I am not aware of any unique evidence or witness specific to the Accused Products located in the District of Delaware.

I declare under penalty of perjury that the foregoing is true and correct.
Executed this 1st day of February, 2023, in Santa Clara, California.


Rust Ince-Schroeder